

Hearing date: November 30, 2015 at 9:30 a.m.

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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re

HYPNOTIC TAXI LLC, et al.,¹

Citibank, N.A.,

Plaintiff,

- against -

BOMBSHELL TAXI LLC, et al.,

Defendants.

Case No.: 15-43300 (CEC)
(Jointly Administered)

Adv. Proc. No. 15-01185 (CEC)

**STATEMENT REGARDING CITIBANK, N.A.'s
TRIAL EXHIBITS FOR NOVEMBER 30, 2015 HEARING**

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers are (i) Hypnotic Taxi LLC (6632)(Case No. 15-43300); (ii) Bombshell Taxi LLC (1282)(Case No. 15-43301); (iii) Bourbon Taxi LLC (7155)(Case No. 15-43302); (iv) Butterfly Taxi LLC (6992)(Case No. 15-43303); (v) Candy Apple Taxi LLC (0249)(Case No. 15-43304); (vi) Chianti Taxi, LLC (6799)(Case No. 15-43305); (vii) Chopard Taxi Inc. (0746)(Case No. 15-43306); (viii) Cupcake Taxi LLC (0324)(Case No. 15-43307); (ix) Dorit Transit Inc. (9129)(Case No. 15-43308); (x) France Taxi LLC, (9592)(Case No. 15-43309); (xi) Hennessey Taxi Inc. (4039)(Case No. 15-43310); (xii) Iceberg Taxi Inc. (5877)(Case No. 15-43311); (xiii) Marseille Taxi LLC (9890)(Case No. 15-43312); (xiv) Merlot Taxi LLC (7103)(Case No. 15-43313); (xv) Milkyway Cab Corp. (5061)(Case No. 15-43314); (xvi) Palermo Taxi, Inc. (5956)(Case No. 15-43315); (xvii) Pinot Noir Taxi LLC (6725)(Case No. 15-43316); (xviii) Pointer Taxi LLC, (2323)(Case No. 15-43317); (xix) Pudding Taxi Inc. (0432)(Case No. 15-43318); (xx) Stoli TaInc. (4079)(Case No. 15-43319); (xxi) Vodka Taxi LLC (4239)(Case No. 15-43320); and (xxii) VSOP Taxi Inc. (3909)(Case No. 15-43321).

Pursuant to the Scheduling Order of the Court dated November 19, 2015 (Docket No. 34), attached hereto as Exhibits 1 through 22 are the documents Citibank, N.A. intends to offer into evidence at the November 30, 2015 hearing.

- 1 Birkin Trust Deed under cover of letter from M. Zimmerman to Portcullis Trustnet Ltd. (Cook Islands)
- 2 Evelyn Trust Deed under cover of letter from M. Zimmerman to Orion Corporate and Trust Services (Belize)
- 3 Kelly Trust Deed under cover of letter from M. Zimmerman to Portcullis Trustnet Ltd. (Cook Islands)
- 4 Lindy Trust Deed under cover of letter from M. Zimmerman to Southpac Trust Nevis Ltd. (Nevis)
- 5 Order to Show Cause with TRO dated November 5, 2015, and supporting documents, previously filed; ECF no.'s 4, 5, 6, and 7
- 6 Emails re: Trustee Resignation Letters
- 7 Trustee Resignation Letters (8)
- 8 Letters Appointing Moscow Trustees
- 9 Order to Show Cause and TRO (11/05/15), and Order Amending TRO and Authorizing Additional Discovery (11/16/15)
- 10 Spreadsheets identifying Trust properties and encumbrances (GF002108-002125)
- 11 Transfer documents for Freidman Residences
- 12 Capital One, N.A. Judgment with affidavits
- 13 Transcript of Ellen Walker deposition taken 11/20/15
- 14 Freidman June 30, 2015 Personal Financial Statement
- 15 Edward Mermelstein Trial Subpoena and Affidavit of Service
- 16 Michael Zimmerman Trial Subpoena and Affidavit of Service

- 17 Ellen Walker Trial Subpoena with Email correspondence
re: Acceptance of Service and Ms. Walker's unavailability
- 18 Freidman March 31, 2014 Personal Financial Statement
- 19 Emails concerning Trustee resignations and appointments
- 20 List of real estate transfers
- 21 Freidman Statement of Financial Condition, December 31,
2010
- 22 Freidman March 31, 2014 Personal Financial Statement
(received from Michael Zimmerman)

Dated: New York, New York
November 25, 2015

ZEICHNER ELIMAN & KRAUSE LLP

By: 

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